

JS 44 (Rev. 06/17)

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

Valerie Rosa

(b) County of Residence of First Listed Plaintiff Monmouth, NJ  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Falcon Law Firm, 714 W. Park Ave., Oakhurst, NJ 07755, (732)  
660-1200

## DEFENDANTS

Mario DeJesus

County of Residence of First Listed Defendant Philadelphia, PA  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

Salmon, Ricchezza, Singer & Turchi, 123 Egg Harbor Road, Sewell,  
NJ 08080 (856) 354-8074

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question  
(U.S. Government Not a Party)
- ☒ 4 Diversity  
(Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                                   | DEF                                   |   | PTF                        | DEF                        |
|---|---------------------------------------|---------------------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1            | Incorporated or Principal Place of Business in This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2            | <input checked="" type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3            | <input type="checkbox"/> 3            | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT		TORTS		FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 375 False Claims Act	
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))	
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability			<input type="checkbox"/> 400 State Reapportionment	
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 330 Federal Employers' Liability	<input type="checkbox"/> 370 Other Fraud			<input type="checkbox"/> 410 Antitrust	
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 371 Truth in Lending			<input type="checkbox"/> 430 Banks and Banking	
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 380 Other Personal Property Damage			<input type="checkbox"/> 450 Commerce	
<input type="checkbox"/> 152 Recovery of Overpayment of Student Loans (Excludes Veterans)	<input checked="" type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 385 Property Damage Product Liability			<input type="checkbox"/> 460 Deportation	
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 355 Motor Vehicle Product Liability				<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations	
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 360 Other Personal Injury				<input type="checkbox"/> 480 Consumer Credit	
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 362 Personal Injury - Medical Malpractice				<input type="checkbox"/> 490 Cable/Sat TV	
<input type="checkbox"/> 195 Contract Product Liability					<input type="checkbox"/> 850 Securities/Commodities/Exchange	
<input type="checkbox"/> 196 Franchise					<input type="checkbox"/> 890 Other Statutory Actions	
					<input type="checkbox"/> 891 Agricultural Acts	
					<input type="checkbox"/> 893 Environmental Matters	
					<input type="checkbox"/> 895 Freedom of Information Act	
					<input type="checkbox"/> 896 Arbitration	
					<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision	
					<input type="checkbox"/> 950 Constitutionality of State Statutes	

## V. ORIGIN (Place an "X" in One Box Only)

- ☐ 1 Original Proceeding
- ☒ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

28 U.S.C. Section 1441 and 28 U.S.C. Section 1446 and 28 U.S.C. 1332

Brief description of cause:

personal injury, motor vehicle

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

10,000,000.00

CHECK YES only if demanded in complaint:

JURY DEMAND:

☒ Yes ☐ No

## VIII. RELATED CASE(S) IF ANY

(See Instructions):

JUDGE

DOCKET NUMBER

DATE

7/10/20

SIGNATURE OF ATTORNEY OF RECORD

Justin P. Callaway, Esq. (JMR)

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY (TRENTON VICINAGE)**

VALERIE ROSA,

Plaintiff,

v.

MARIO DE JESUS, ASSURED PARTNER;  
TRANSPORT, and JOHN DOES 1-10  
(representing presently unidentified  
individuals, businesses and/or corporations  
who owned, operated, maintained,  
supervised, designed, constructed, repaired  
and/or controlled the vehicle in question or  
otherwise employed the defendants),

Defendants.

CIVIL ACTION NO.

JURY TRIAL DEMANDED

**NOTICE OF REMOVAL**

PLEASE TAKE NOTICE that Defendant Mario DeJesus, by and through his attorneys, Salmon, Ricchezza, Singer & Turchi, LLP, hereby removes this matter from the Superior Court of New Jersey, Law Division, Monmouth County, to the United States District Court of the District of New Jersey pursuant to 28 U.S.C. Section 1441 et seq. and in support thereof avers as follows:

1. On or about June 11, 2020, Plaintiff Valerie Rosa filed a Complaint in the Superior Court of New Jersey, Law Division, Monmouth County. (A copy of the Complaint is attached hereto as ***Exhibit "A."***)

2. Summons was issued by Plaintiff to Mr. DeJesus. The summons was dated June 12, 2020. (A copy of the summons is attached hereto as ***Exhibit "B."***)

3. Mr. DeJesus received the summons and Complaint via service on or after June 15, 2020.

4. At all times relevant hereto, Plaintiff is and was a citizen of the State of New Jersey residing at 66 Wolfhill Avenue, Oceanport, NJ 07757.

5. At all times relevant hereto, Mr. DeJesus is and was a resident of Pennsylvania with a residence of 2757 Tremont Street, Philadelphia, PA 19136.

6. The other named party to this litigation is Assured Partner Transport. To the best of Mr. DeJesus's knowledge, Assured Partner Transport is not a legally recognized entity and does not exist.

7. The Complaint alleges that Plaintiff sustained injuries as a result of an accident on January 23, 2019, while she was driving on Somme Street near the intersection with Ferry Street, in Newark, NJ.

8. The Complaint alleges that, as a result of the alleged incident in question, she suffered the following:

[s]evere, serious and permanent injuries; she was caused to suffer great pain and anguish and will in the future be caused to suffer great pain and anguish; was caused to incur medical expenses and will in the future be caused to incur medical expenses; has been and will in the future be disabled and prevented from attending to her necessary affairs and business.

Plaintiff [] further contends that the physical injuries she sustained as a result of this collision are permanent.

(*Ex. A*).

9. In the Complaint Plaintiff demands damages against Mr. De Jesus in the amount of \$10,000,000 (\$5,000,000 in Count I; and \$5,000,000 in Count IV). (*Ex. A*).

10. Based on the aforementioned injuries, it appears that this case has an amount in controversy in excess of \$75,000.00 exclusive of interest and costs.

11. This Court has original jurisdiction of this matter pursuant to 28 U.S.C. §1332 in that there is complete diversity of citizenship.

12. The documents attached hereto constitute all of the pleadings, process and orders served upon the petitioner in this action in Superior Court.

13. This case is removable from Superior Court pursuant to 28 U.S.C. §1446 *et seq.*

14. This notice is being filed within thirty (30) days of service of Plaintiff's summons and Complaint on the first Defendant to receive service in this matter.

15. Diversity of citizenship existed at the time the action sought to be removed was commenced and continues through the time of filing of this Notice such that Defendant is entitled to remove this matter pursuant to 28 U.S.C. §§1332, 1441 and 1446.

16. Based on the matter set forth here and above, this case is removable and said removal has commenced within the time provided by 28 U.S.C. §1446(b).

17. All named Defendants consent to removal of this matter.

WHEREFORE, Defendant Mario DeJesus prays that the above-captioned action, now pending against it in the Superior Court of New Jersey, be removed therefrom to this Court.

**SALMON, RICCHEZZA, SINGER & TURCHI LLP**

/s/ Justin P. Callaway  
Zachary Ballard, Esq. (NJ ID #1447-2007)  
Justin P. Callaway, Esq. (NJ ID #03201-2007)  
123 Egg Harbor Road, Suite 406  
Sewell, NJ 08080  
Phone: (856) 354-8074  
Fax: (856) 354-8075  
*Attorney for Defendant Mario DeJesus*

# **EXHIBIT A**

FALCON LAW FIRM, LLC  
 PATRICK L. FALCON, ESQ.  
 (R-036821993)  
 714 WEST PARK AVE  
 OAKHURST NEW JERSEY 07755  
 732-660-1200  
 Attorneys for Plaintiff

VALERIE ROSA	Plaintiff(s),	: SUPERIOR COURT OF NEW JERSEY : LAW DIVISION : MONMOUTH COUNTY
Vs		: DOCKET NO.:
MARIO DE JESUS, ASSURED PARTNER TRANSPORT, and JOHN DOES 1-10 (representing presently unidentified individuals, businesses and/or corporations who owned, operated, maintained, supervised, designed, constructed, repaired and/or controlled the vehicle in question or otherwise employed the defendants),		: Civil Action : COMPLAINT, NOTICE TO PRODUCE, : DEMAND FOR ANSWERS TO : INTERROGATORIES, SUPPLEMENTAL : INTERROGATORIES, DEMAND FOR : DISCOVERY OF INSURANCE : COVERAGE, JURY DEMAND, : DESIGNATION OF TRIAL COUNSEL, : AND CERTIFICATION
Defendants.		

Plaintiff, Valerie Rosa, residing at 66 Wolfhill Avenue, Oceanport, County of Monmouth, State of New Jersey, through her attorneys complaining of the defendants says:

### FIRST COUNT

1. On or about January 23, 2019, the plaintiff, VALERIE ROSA was traveling on Somme Street at the intersection of Ferry Street in the City of Newark, State of New Jersey.
2. At the time and place aforesaid, defendant, MARIO DE JESUS was operating his vehicle in a negligent manner as to cause a collision with plaintiff's vehicle, causing plaintiff, VALERIE ROSA to sustain severe, serious and permanent injuries; she was caused to suffer great pain and anguish and will in the future be caused to suffer great pain and anguish; was caused to incur medical expenses and will in the future be caused to



incur medical expenses; has been and will in the future be disabled and prevented from attending to her necessary affairs and business.

4. Plaintiff VALERIE ROSA, further contends that the physical injuries she sustained as a result of this collision are permanent.

WHEREFORE, the plaintiff, VALERIE ROSA, demands Judgment against all defendants, jointly, severally or in the alternative, for damages, interest and cost of suit.

### SECOND COUNT

1. The plaintiff VALERIE ROSA, repeats the allegations contained in the First Count as if the same were more fully set forth herein and made a part hereof.

2. At all times hereinbefore stated defendant ASSURED PARTNER TRANSPORT was the owner of the motor vehicle operated by defendant Mario DeJesus, who was acting as their servant, agent and/or employee. Defendant Mario DeJesus was an employee of Assured Partner Transport and was acting on their behalf.

3. As a direct and proximate cause of the negligence of defendant ASSURED PARTNER TRANSPORT, the plaintiff, VALERIE ROSA, was caused to sustain severe, serious and permanent injuries; she was caused to suffer great pain and anguish and will in the future be caused to suffer great pain and anguish; was caused to incur medical expenses and will in the future be caused to incur medical expenses; has been and will in the future be disabled and prevented from attending to her necessary affairs and business.

WHEREFORE plaintiff VALERIE ROSA demands Judgment against defendant ASSURED PARTNER TRANSPORT on this Count together with interest and costs of suit.

### THIRD COUNT

1. The plaintiff, VALERIE ROSA repeats the allegations contained in the First and Second Count as if the same were more fully set forth herein and made a part hereof.

2. Defendant, JOHN DOES 1-10, were responsible for the ownership, operation, maintenance, control, supervision and/or repair of the aforementioned subject vehicles or otherwise employed the defendant, were negligent in the manner in which the said vehicles were owned, operated, maintained, controlled, supervised and/or repaired.

3. As a direct and proximate cause of the negligence of defendant, JOHN DOES 1-10, the plaintiff, VALERIE ROSA, was caused to sustain severe, serious and permanent injuries; she was caused to suffer great pain and anguish and will in the future be caused to suffer great pain and anguish; was caused to incur medical expenses and will in the future be caused to incur medical expenses; has been and will in the future be disabled and prevented from attending to her necessary affairs and business.

WHEREFORE, the plaintiff, VALERIE ROSA , demands judgment against all defendants, jointly, severally or in the alternative, for damages, interest and cost of suit.

#### FOURTH COUNT

1. The plaintiff, VALERIE ROSA repeats the allegations contained in the First, Second and Third Counts as if the same were more fully set forth herein and made a part hereof.

2. Plaintiff, VALERIE ROSA alleges that there was a violation of New Jersey Motor Vehicle Statutes, N.J.S.A. 39:4-97, and other Motor Vehicle Regulations, which violations constitute a statutory tort.



WHEREFORE, the plaintiff VALERIE ROSA demands Judgment against the defendants, jointly, severally or in the alternative, for damages, interest and cost of suit.

FALCON LAW FIRM, LLC  
Attorneys for Plaintiff (s)

Dated: June 11, 2020

*Alexander R. DeSevo*  
By: \_\_\_\_\_  
ALEXANDER R. DeSEVO

Pursuant to Rule 4:5-2, we hereby demand the following on behalf of plaintiff(s):

First Count -- Plaintiff hereby demands Damages in the amount of \$5,000,000.00.

Second Count -- Plaintiff hereby demands Damages in the amount of \$5,000,000.00.

Third Count -- Plaintiff hereby demands Damages in the amount of \$5,000,000.00

Fourth County - Plaintiff hereby demands Damages in the amount of \$5,000,000.00

REQUEST FOR ADMISSIONS

PLEASE admit or deny the following:

1. The version of the accident on the police report is accurate.
2. The Defendant is fully liable for the happening of the accident.
3. The Plaintiffs' injuries referenced were proximately caused by Defendant's negligence on January 23, 2019.

4. The Plaintiffs' medical treatment was reasonable and necessary and a proximate cause of Defendant's negligence on January 23, 2019.

#### NOTICE TO PRODUCE

Pursuant to Rule 4:18-1, the plaintiff hereby demands that the defendants produce the following documents within thirty (30) days as prescribed by the Rules of Court. Additionally, please be advised that the following requests are ongoing and continuing in nature and the defendant is, therefore, required to continuously update its responses thereto as new information or documentation comes into existence.

1. The amounts of any and all insurance coverage covering the defendants, including but not limited to, primary insurance policies, secondary insurance policies, "PUP" (personal umbrella policies) and/or umbrella policies. For each such policy of insurance, supply a copy of the declaration page therefrom.

2. Copies of any and all documentation or reports, including but not limited to, police reports, accident reports and/or incident reports concerning the happening of the incident in question or any subsequent investigation of same.

3. Copies or duplicates of any and all photographs, motion pictures, videotapes, films, drawings, diagrams, sketches, or other reproductions, descriptions or accounts concerning the individuals involved in the accident in question, the property damage sustained, the accident scene, or anything else relevant to the incident in question.

4. Copies of any and all signed or unsigned statements, documents, communications and/or transmissions, whether in writing, made orally or otherwise recorded by any mechanical or electronic means, made by any party to this action, any

witness, or any other individual, business, corporation, investigative authority, or other entity concerning anything relevant to the incident in question.

5. Copies of any and all documentation, including but not limited to, contracts between the owner of the property or product involved in the incident in question or any of the parties involved in this matter.

6. Copies of any and all discovery received from any other parties to the action in question.

7. Copies of any and all medical information and/or documentation concerning the plaintiff in this matter whether it concerns any medical condition or treatment which took place before, during or after the time of the incident in question.

8. Copies of any and all records of any type subpoenaed by the defendant or received from any other source concerning the plaintiff or the incident in question.

9. Any and all documents with regard to the Defendant's claim or that which Defendant's shall introduce at trial including but not limited to the following:

a. a copy of statements obtained by any witness that are not privileged and which have been reduced to writing in some fashion;

b. copies of any incident reports on file for the incident in question;

c. copies of any repair orders on file for the vehicles in question;

d. copies of any medical reports relating to the Plaintiff in the possession of the Defendant, whether or not such records or reports are for injuries sustained in this incident or at any time unless previously obtained by the Defendant from the undersigned counsel;

f. copies of any police reports or records obtained which in any way relate to the incident which is the subject of this claim;

- g. copies of any Municipal, county, state or Federal investigative reports;
- h. copies of any drawings, maps, charts, diagrams or other representation of the scene of the incident or of any other aspect of the accident which is subject of this claim;
- i. copies of any photographs taken of the Plaintiff subsequent to the incident which is the subject of this claim, including any surveillance photos that Defendant may offer into evidence at the time of trial;
- j. copies of any motion pictures or video tapes taken of the Plaintiff subsequent to the incident which is the subject of this claim;
- k. copies of any and all report of any expert who has received any aspect of this case on behalf of the Defendant or Defendant's attorney or who have submitted a report to either the Defendant, or Defendant's attorney;

#### DEMAND FOR INTERROGATORIES

Demand is hereby made on the defendants to answer fully and responsively Form C and Form C(1) uniform interrogatories, personal injury, Superior Court, found in Appendix II as provided by R.4:17-1(b)(ii) and the other applicable Rules of Court.

#### SUPPLEMENTAL INTERROGATORIES

1. Describe in detail any obstructions to your view at the time and location of the accident set forth in the Complaint served upon you.
2. Describe in detail any traffic control devices at or near the place of the accident set forth in the Complaint served upon you.
3. State where the point of impact between the vehicles involved in the accident set forth in the Complaint served upon you took place, giving distances in feet with reference to the nearest intersection or other established points.

4. Describe in detail how much time elapsed from the time you first observed Plaintiff's vehicle until the impact occurred.

5. When you first observed the plaintiff, state the distance in feet between defendant's motor vehicle and the point of impact.

6. When you first saw plaintiff, state where plaintiff was with reference to the position of defendant's vehicle.

7. At the moment of impact, set forth the speed in m.p.h. of defendant's vehicle and the speed in m.p.h. of plaintiff's vehicle.

8. If you have reviewed the police report, describe in detail whether it is complete and accurate.

9. Describe in detail any problems you had with the vehicle you were driving.

10. Describe in detail the amounts of any and all insurance coverage covering the defendant, including but not limited to, primary insurance policies, secondary insurance policies, "PUP" (personal umbrella policies) and/or umbrella insurance policies. For each such policy of insurance, supply a copy of the declaration page therefrom.

#### DEMAND FOR DISCOVERY OF INSURANCE COVERAGE

Pursuant to R:4:10-2(b), demand is hereby made that defendant disclose to plaintiff's attorney whether there are any insurance agreements or policies under which any person or firm carrying on an insurance business may be liable to satisfy part or all of a judgment and provide plaintiff's attorney with true copies of all such insurance agreements or policies including, but not limited to, any and all declaration sheets. This demand shall be deemed to include and cover not only primary coverage but also and all excess, catastrophe, PUP (Personal Umbrella Policy) and umbrella policies.



DESIGNATION OF TRIAL COUNSEL

PLEASE TAKE NOTICE that pursuant to R.4:25-4, Alexander R. DeSevo, Esquire, (Attorney I.D. Number 010231994) is hereby designated as trial counsel in the above matter for the firm of Falcon Law Firm, LLC, attorneys for the plaintiff.

JURY DEMAND

PLEASE TAKE NOTICE THAT, the plaintiff, pursuant to R. 4:35-1 hereby demands a trial by jury.

CERTIFICATION

I hereby certify that this matter is not the subject matter of any other suit presently pending in any other Court or in any Arbitration proceeding. At this time, we know of no other parties not named herein that should be joined.

FALCON LAW FIRM, LLC

Attorneys for Plaintiff (s)

*Alexander R. DeSevo*

By: \_\_\_\_\_

ALEXANDER R. DeSEVO

Dated: June 11, 2020



# **EXHIBIT B**

FALCON LAW FIRM, LLC  
 Patrick L. Falcon, Esq.  
 Attorney ID No.: - 036821993  
 714 WEST PARK AVENUE  
 OAKHURST, NJ 07755  
 732-660-1200  
 Attorney(s) for Plaintiff(s):

VALERIE ROSA	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION
Plaintiff(s),	:	MONMOUTH COUNTY
	:	
Vs	:	DOCKET NO.: MON-L-1827-20
	:	
	:	Civil Action
MARIO DE JESUS, ASSURED	:	
PARTNER TRANSPORT, and JOHN	:	SUMMONS
DOES 1-10 (representing presently	:	
unidentified individuals, businesses	:	
and/or corporations who owned,	:	
operated, maintained, supervised,	:	
designed, constructed, repaired	:	
and/or controlled the vehicle in	:	
question or otherwise employed the	:	
defendants),	:	

**THE STATE OF NEW JERSEY TO THE DEFENDANT NAMED ABOVE:**  
**MARIO DE JESUS**

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the day you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at [http://www.judiciary.state.nj.us/pro\\_se/10153\\_deptyclerklawref.pdf](http://www.judiciary.state.nj.us/pro_se/10153_deptyclerklawref.pdf).) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, New Jersey 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement

(available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$175.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize you money, wages, or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available at [http://www.judiciary.state.nj.us/prose/10153\\_deputyclerklawref.pdf](http://www.judiciary.state.nj.us/prose/10153_deputyclerklawref.pdf).

Dated: June 12, 2020

*s://Michelle M. Smith*

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Clerk of Superior Court

Name of Defendant Be Served: MARIO DeJESUS  
Address of Defendant to Be Served: 2757 TREMONT STREET  
PHILADELPHIA, PA.

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY (TRENTON VICINAGE)**

VALERIE ROSA,

Plaintiff,

v.

MARIO DE JESUS, ASSURED PARTNER:  
TRANSPORT, and JOHN DOES 1-10  
(representing presently unidentified  
individuals, businesses and/or corporations  
who owned, operated, maintained,  
supervised, designed, constructed, repaired  
and/or controlled the vehicle in question or  
otherwise employed the defendants),

Defendants.

CIVIL ACTION NO.

JURY TRIAL DEMANDED

**CERTIFICATE OF SERVICE**

I, Justin P. Callaway, Esquire, hereby certify that the foregoing *Notice of Removal* was served on this 10<sup>th</sup> day of July, 2020, via U.S. First Class Mail upon the following counsel of record.

Patrick L. Falcon, Esq.  
Falcon Law Firm, LLC  
714 West Park Avenue  
Oakhurst, NJ 07755

**SALMON, RICCHEZZA, SINGER & TURCHI LLP**

/s/ Justin P. Callaway  
Zachary Ballard, Esq. (NJ ID #1447-2007)  
Justin P. Callaway, Esq. (NJ ID #03201-2007)  
123 Egg Harbor Road, Suite 406  
Sewell, NJ 08080  
Phone: (856) 354-8074  
Fax: (856) 354-8075  
*Attorney for Defendant Mario DeJesus*